

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Relay Services and)	CC Docket No. 98-67
Speech-to-Speech Services for Individuals)	
With Hearing and Speech Disabilities)	
)	
Americans With Disabilities Act of 1990)	CG Docket No. 03-123

VERIZON’S REPLY COMMENTS ON PETITIONS FOR RECONSIDERATION

All commenters supported Verizon’s petition for reconsideration. *See* Hamilton Relay Comments, at 2-3 (filed Oct. 20, 2003); SBC Comments, at 3 (filed Oct. 20, 2003); Sprint Comments, at 2 (filed Oct. 20, 2003); Comments of WorldCom d/b/a MCI, at 2-3 (filed Oct. 20, 2003). The Commission should not require that TRS providers send emergency calls to the *same* Public Safety Answering Point (“PSAP”) that would have been reached if the caller dialed 911, or update their database on the same schedule as 911 “routing databases.” *See* Verizon Petition for Reconsideration, at 1-4, 7 (filed Sept. 24, 2003) (“Verizon Petition”). As other commenters confirmed, allowing the current rule to stand would require the creation of an expensive and technically burdensome system that is not required by the statute. *See, e.g.,* SBC Comments, at 3-4 (noting that “many TRS providers will be incapable of complying with this requirement absent significant upgrades to their facilities,” and that the rules are “wholly unnecessary” because “TRS users already have functional equivalence under the” Americans with Disabilities Act); *see also* Verizon

Petition, at 2-5. The Commission should grant Verizon's petition for reconsideration on this issue.

AT&T filed a petition for reconsideration that proposed similar relief. *See* AT&T Petition for Reconsideration, at 4 (filed Sept. 24, 2003) ("AT&T Petition") (noting that "TRS providers would face serious constraints in updating their PSAP databases concurrently with the changes that are made in databases that determine the PSAPs for routing voice callers' 911 traffic"). However, the Commission should reject AT&T's alternative suggestions to revoking the new emergency call requirement. In particular, it should not "mandate the development and deployment of . . . a single database jointly by all TRS providers." AT&T Petition, at 7. As one commenter noted, "the Commission cannot issue such mandate on the basis of the current record." Sprint Comments, at 4. Indeed, all of the evidence on the record points against requiring such a national database.

As an initial matter, AT&T states that it *already* has access to "a national PSAP database maintained by a third party vendor" that it uses to handle TRS emergency calls. AT&T Petition, at 4. Thus, there is no evidence that the Commission needs to "mandate" the creation of a national PSAP database.

And if the Commission required that this "national" database route TRS emergency calls to the same PSAP that would have been reached if the caller had dialed 911, the same technical burdens to implementation that make it infeasible for LECs to provide 911 routing information to TRS providers would apply equally to a "national" database. *See* Verizon Petition, at 5-8. Due to the complicated nature of the 911 routing system, there are no existing LEC "PSAP databases" that can be shared with TRS providers or a national

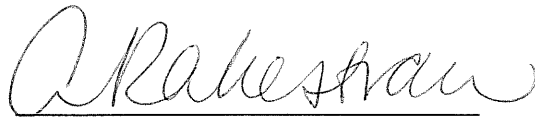
TRS database. For most 911 systems, when a caller dials 911, the switch serving the customer routes the call over a dedicated trunk group to a 911 selective router, which is a piece of network equipment that functions like a switch and routes calls to an appropriate PSAP. The information about which PSAP will receive that call is accessed via the 911 selective router. The 911 routing information is not in a “database” that can be read or used by a TRS provider or national database manager; instead, it is in a format designed to interact with the 911 routers. In addition, in Verizon’s territory, the 911 selective routers generally do not interact with other selective routers; thus, information about PSAPs served by one selective router generally is not available to any other selective routers. Verizon Petition, at 6. Because 911 routing is set up at each selective router, this routing information is not in one nationwide standard or central location, but potentially hundreds. *Id.*¹

Moreover, there is no evidence that a “national” database is necessary, or even desirable in comparison to the current method for handling emergency calls for TRS users. First, a national database is not required by the Act. Section 225 only requires that there be “functionally equivalent” services to those without hearing or speech impairments. 47 U.S.C. § 225(a)(3). Because there does not exist a national database for routing 911 calls, a similar database for TRS emergency calls is not required to satisfy the functional equivalency mandate. In addition, requiring the creation of one single, federally mandated

¹ For the same reasons, it is not technically feasible to adopt AT&T’s other alternative suggestion, which was to require LECs, “as they update their own PSAP databases to concurrently make the same information available to TRS providers.” AT&T Petition, at 5. *See also* Verizon Comments, at 2-4 (filed Oct. 20, 2003).

nationwide system likely would only impose a burdensome and extremely expensive requirement that could distract from and compromise the already effective methods for handling these emergency calls. As the Commission has previously recognized, the better course is to educate TRS users to dial 911 directly in the event of an emergency.²

Respectfully submitted,



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² *Telecommunications Relay Services and Speech-to-Speech Services for Individuals With Hearing and Speech Disabilities; Americans With Disabilities Act of 1990*, Notice of Proposed Rulemaking, 18 FCC Rcd 12379, ¶ 37 (2003).